

Message

From: Menzel, Jeff [jeff.menzel@ncdenr.gov]
Sent: 4/8/2020 7:44:39 PM
To: Whiting, Paula [Whiting.Paula@epa.gov]
Subject: FW: [External] Lead Concentrate Removal Plan - Final Progress Report
Attachments: Mayse 3.jpg; Mayse 2.jpg; Mayse 1.jpg

Hey Paula,

Sorry you couldn't make it to Mooresboro in March, I heard you have a new gig at the EPA lab. I'm forwarding a follow-up email I sent asking about material being stored at the Mayse warehouses along with some pictures. I haven't received a formal response yet to my questions. Hope you are doing well and let me know if you have any questions.

Thanks,
Jeff

Jeff Menzel
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From: Menzel, Jeff
Sent: Tuesday, March 3, 2020 4:45 PM
To: 'tbasilone@azr.com' <tbasilone@azr.com>; Morris, Sean <sean.morris@ncdenr.gov>; Burch, Brent <brent.burch@ncdenr.gov>
Subject: RE: [External] Lead Concentrate Removal Plan - Final Progress Report

Tim,

As you know, we conducted a visual walk-through inspection, along with XRF monitor screening, at 3 of the 4 warehouses on 2/11/2020. We understand that one of the warehouses used to accumulate lead concentrate is now occupied by a new tenant. The inspection was performed to verify the removal of all super-sack containers of lead concentrate and to determine if any heavy metal residues remain within the areas used to store this material. XRF sampling was performed in various locations associated with three of the warehouses, which included screening of interior concrete floors, soil next to building exhaust fan vents (Warehouse 2) and areas outside of loading dock doors (Warehouse 4 & 5). XRF readings indicated the presence of lead & arsenic on concrete floors within all three warehouses, with the highest readings detected within concrete floor expansion joints. There were more than 100 palletized super-sack containers, identified as holding lead carbonate, observed in Warehouse 2, and a layer of fine dust/residue was present on the top of many of the pallets. XRF readings of this dust/residue indicated high concentrations of lead & arsenic.

In addition, inspection records provided to me by AZR representatives indicate that there were at least nine separate notations indicating some type of damage occurred to super-sack containers within the warehouses, such as accidental punctures from forklifts. The inspection records explained that spills of lead concentrate, from damaged super-sacks, were cleaned by dry sweeping of the spilled materials.

Due to the presence of lead and arsenic at measurable levels detected by the XRF in all warehouses inspected, this office is requesting that additional cleaning be performed in each of the warehouses to ensure the proper removal of these hazardous waste constituents before the buildings are leased to new tenants.

Per our conversation yesterday, I would like more information regarding the lead carbonate being stored in Warehouses 2. The super sacs currently stored there are labeled with the words, "lead concentrate". The Immediate Action Notice of Violation Docket # 2019-076 was issued with the understanding that all materials being stored in the four warehouses was generated at the Palmerton PA facility. We now understand that this is generated at the Mooresboro facility and the dates on the super-sacks indicated that it was generated, or at least containerized, around the beginning of 2019. Is the lead carbonate generated from normal operations or is this from a clean out and how has it been historically managed? How will this material be managed moving forward? Do you plan to use this location for future storage of materials being generated at AZR/AZP facilities? Can you provide commerce agreements to support claims that this is a viable product?

Thanks,
Jeff

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From: Menzel, Jeff
Sent: Monday, February 10, 2020 8:14 AM
To: Polk, Brian <brian.polk@ncdenr.gov>; Morris, Sean <sean.morris@ncdenr.gov>
Subject: FW: [External] Lead Concentrate Removal Plan - Final Progress Report

From: Timothy Basilone [<mailto:tbasilone@azr.com>]
Sent: Friday, February 7, 2020 5:09 PM
To: Menzel, Jeff <jeff.menzel@ncdenr.gov>
Cc: Mike Reid <mreid@azr.com>; Shannon Andrews <sandrews@azr.com>; Charles G. Howell <CGHowell@azr.com>
Subject: RE: [External] Lead Concentrate Removal Plan - Final Progress Report

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Thanks Jeff. I've made arrangements with Mike Reid and Charlie Howell to meet with you, and to have the paperwork available. Please let me know if you have any questions or concerns.

Regards,
Tim

TIMOTHY R. BASILONE

Vice President - Environmental Affairs
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From: Menzel, Jeff <jeff.menzel@ncdenr.gov>
Sent: Friday, February 7, 2020 8:10 AM
To: Timothy Basilone <tbasilone@azr.com>
Cc: Mike Reid <mreid@azr.com>; Cameron Howell <CHowell@azr.com>; Shannon Andrews <sandrews@azr.com>
Subject: RE: [External] Lead Concentrate Removal Plan - Final Progress Report

Tim,
Thanks for setting this up.
I'd like to review the inspection records and shipping papers while there.
Jeff

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From: Timothy Basilone [<mailto:tbasilone@azr.com>]
Sent: Wednesday, February 5, 2020 5:37 PM
To: Menzel, Jeff <jeff.menzel@ncdenr.gov>
Cc: Mike Reid <mreid@azr.com>; Cameron Howell <CHowell@azr.com>; Shannon Andrews <sandrews@azr.com>
Subject: RE: [External] Lead Concentrate Removal Plan - Final Progress Report

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Jeff,
Thanks for getting back to me. Yes, we can meet you on Tuesday February 11 at 10 AM at the Mayes Warehouses for a final walk through. Please advise me if you have any questions beforehand. Mike Reid from the Mooresboro facility will likely be there to meet with you.
Regards,
Tim

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From: Menzel, Jeff <jeff.menzel@ncdenr.gov>
Sent: Wednesday, February 5, 2020 8:52 AM
To: Timothy Basilone <tbasilone@azr.com>
Subject: RE: [External] Lead Concentrate Removal Plan - Final Progress Report

Tim,
Would you all be able to meet at the warehouses next Tuesday the 11th around 10am for a final walkthrough?
Thanks

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From: Timothy Basilone [<mailto:tbasilone@azr.com>]
Sent: Tuesday, February 4, 2020 1:33 PM
To: Woosley, Julie <julie.woosley@ncdenr.gov>; Menzel, Jeff <jeff.menzel@ncdenr.gov>
Subject: [External] Lead Concentrate Removal Plan - Final Progress Report

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Ms. Woosley,

Pursuant to the American Zinc Recycling Lead Concentrate Removal and Reclamation Plan (the "Plan") submitted with my letter to you of September 15, 2019, I am writing to provide the fourth and final monthly update on implementation of the Plan. Attached is a letter providing information as to the completion of work activities for removing lead concentrate as described in the Reclamation Plan.

If you have any questions please contact me.
Best Regards,
Tim

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